

I. STIPULATION

1. Plaintiff Laura Zamora Jordan and Defendant Nationstar Mortgage LLC have reached an agreement in principle to settle this matter (ECF No. 297). The parties are working diligently to finalize a written settlement agreement that memorializes all terms of the settlement.

2. The parties previously advised the Court that they anticipated finalizing the written settlement agreement quickly, and that Plaintiff would be prepared to file her unopposed motion for preliminary approval of the settlement by January 31, 2018. ECF No. 299.

3. Based on the parties' stipulation, the Court set a deadline of January 31, 2018 for Plaintiff to file her unopposed motion for preliminary approval of the classwide settlement. ECF No. 300.

4. Subsequent to that Order, the parties submitted a request that the court extend the deadline for Plaintiff to file her unopposed motion for preliminary approval to February 21, 2018. ECF No. 301. An order approving this stipulation has not been entered.

5. Despite the parties' diligence, their continued negotiation of the written terms of the settlement has taken longer than expected. The parties are, in fact, returning to mediation to assist in working out the details of the settlement

1 agreement. As a result, the parties have not yet finalized the written settlement
2 agreement and Plaintiff cannot file her preliminary approval motion as planned.

3 6. In light of these developments and for the foregoing reasons, the
4 parties jointly request that the Court vacate the February 21, 2018 deadline for
5 plaintiff to file her motion for preliminary approval of the settlement, and that
6 March 23, 2018 be set as the deadline for the parties to file a revised proposed
7 schedule for seeking preliminary approval of the settlement.

8 STIPULATED TO AND DATED this 21st day of February, 2018.

9 JEFFERS, DANIELSON, SONN
10 & AYLWARD, P.S.

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20 STIPULATION REGARDING PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL OF
CLASSWIDE SETTLEMENT - 3
42H9879

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STIPULATION REGARDING PLAINTIFF'S
MOTION FOR PRELIMINARY APPROVAL OF
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 21, 2018, I electronically filed the
3 foregoing with the Clerk of the Court using the CM/ECF System which will send
4 notification of such filing to the following:

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STIPULATION REGARDING PLAINTIFF'S
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CLASSWIDE SETTLEMENT - 5
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DATED this 21st day of February, 2018.

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